

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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|---|---|-----------------------|
| In re: |) | |
| TEAM SYSTEMS INTERNATIONAL, LLC, ¹ |) | Chapter 11 |
| Debtor. |) | Case No. 22-10066-CTG |
| |) | |
| |) | |

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
VIDEO HEARING ON FEBRUARY 9, 2022 AT 1:00 P.M. (PREVAILING EASTERN
TIME), BEFORE THE HONORABLE CRAIG T. GOLDBLATT, AT THE
UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE**

**THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM
AND REQUIRES ALL PARTICIPANTS TO REGISTER BY 4:00 P.M. ON FEBRUARY 8, 2022.
COURTCALL WILL NOT BE USED TO DIAL IN.**

PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:

<https://debuscourts.zoomgov.com/meeting/register/vJiscumhqDguH8jWKxTK93ESFxDcex4S71M>

**ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL CONTAINING
PERSONAL LOG-IN INFORMATION FOR THE HEARING.**

I. MATTER UNDER CERTIFICATE OF NO OBJECTION (CNO)

1. Motion of Debtor for Entry of an Order, Pursuant to Bankruptcy Code Sections 105(a), 327, 328, and 330, Authorizing the Debtor to Retain and Compensate Certain Professionals Utilized in the Ordinary Course of Business Filed by Team Systems International, LLC [Docket No. [24](#), filed January 25, 2022]

Objection / Response Deadline: February 2, 2022 at 4:00 p.m. (ET)

Objections / Responses Received: None.

Related Document:

- a. Certificate of No Objection to Debtor's Motion for Entry of an Order, Pursuant to Bankruptcy Code Sections 105(a), 327, 328, and 330, Authorizing the Debtor to Retain and Compensate Certain

¹ The Debtor in this chapter 11 case has a last four digit federal tax ID of 8411. The location of the Debtor's service address in these chapter 11 case is 16192 Coastal Highway Lewes, Delaware 19958.

Professionals Utilized in the Ordinary Course of Business Filed by Team Systems International, LLC [Docket No. [60](#), filed February 5, 2022]

Status: A Certificate of No Objection has been filed with the Court. No hearing is necessary unless required by the Court.

II. MATTERS GOING FORWARD

2. Motion of Debtor for Entry of Interim and Final Orders (I) Authorizing Debtor to (A) Continue Its Existing Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Its Bank Account and Existing Business Forms, and (D) Implement Changes to the Existing Cash Management Systems as Necessary; (II) Scheduling a Final Hearing; and (III) Granting Related Relief [Docket No. [4](#), filed January 18, 2022]

Objection / Response Deadline: February 2, 2022 at 4:00 p.m. (ET)

Objections / Responses Received:

- a. Response of GPDEV, LLC, Simons Exploration, Inc. to Motion for Entry of Interim and Final Orders (I) Authorizing Debtor to (A) Continue its Existing Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain its Bank Account and Existing Business Forms, and (D) Implement Changes to the Existing Cash Management System as Necessary [Docket No. [12](#), filed January 21, 2022]

Status: This matter is currently going forward on a final basis. Witnesses may testify. A certification of counsel will be filed prior to the hearing.

3. Application of Debtor to Employ Robinson & Cole LLP as Counsel [Docket No. [34](#), filed January 26, 2022]

Objection / Response Deadline: February 2, 2022 at 4:00 p.m. (ET)

Objections / Responses Received:

- a. Objection of GPDEV, LLC, Simons Exploration, Inc. to Debtor's Application to Employ as Counsel and Motion for Interim Compensation and Reimbursement Procedures [Docket No. [51](#), filed February 2, 2022]

Related Documents

- i. Debtor's Response to GPDEV, LLC and Simons Exploration, Inc.'s Opposition to Debtor's Application to Employ Robinson & Cole LLP as

Counsel and Motion for Interim Compensation and Reimbursement
Procedures [Docket No. [55](#), filed February 4, 2022]

Status: This matter is going forward.

4. Motion of Debtor for Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. [35](#), filed January 26, 2022]

Objection / Response Deadline: February 2, 2022 at 4:00 p.m. (ET)

Objections / Responses Received:

- a. Objection of GPDEV, LLC, Simons Exploration, Inc. to Debtor's Application to Employ as Counsel and Motion for Interim Compensation and Reimbursement Procedures [Docket No. [51](#), filed February 2, 2022]

Related Documents

- i. Debtor's Response to GPDEV, LLC and Simons Exploration, Inc.'s Opposition to Debtor's Application to Employ Robinson & Cole LLP as Counsel and Motion for Interim Compensation and Reimbursement Procedures [Docket No. [55](#), filed February 4, 2022]

Status: This matter is going forward.

5. Motion of Debtor for Limited Relief from Automatic Stay to Continue the Eleventh Circuit Appeal [Docket No. [38](#), filed January 26, 2022]

Objection / Response Deadline: February 2, 2022 at 4:00 p.m. (ET)

Objections / Responses Received:

- a. Objection of GPDEV, LLC, Simons Exploration, Inc. to Debtor's Motion for Limited Relief From the Automatic Stay to Continue the Eleventh Circuit Appeal [Docket No. [50](#), filed February 2, 2022]

Related Documents

- i. Debtor's Response to GPDEV, LLC and Simons Exploration, Inc.'s Opposition to Debtor's Motion for Limited Relief from Automatic Stay to Continue the Eleventh Circuit Appeal [Docket No. [59](#), filed February 4, 2022]

Status: This matter is going forward.

6. GPDEV, LLC, Simons Exploration, Inc.'s Motion to Dismiss Case [Docket No. [41](#), filed January 27, 2022]

Objection / Response Deadline: February 8, 2022 at 5:00 p.m. (ET)

Objections / Responses Received: None at this time.

Related Documents

- i. Scheduling Order [Docket No. [21](#), entered January 24, 2022]

Status: This matter is going forward. Witnesses may testify.

Dated: February 7, 2022
Wilmington, Delaware

ROBINSON & COLE LLP

/s/ Jamie L. Edmonson

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Proposed counsel to the Debtor